I. **POLICY**

A. The Advocate CME office has the responsibility to ensure that continuing medical education activities comply with all Accreditation Council for Continuing Medical Education (ACCME) Essential Areas, Elements, Criteria (including the Standards for Commercial Support) and accreditation policies and American Medical Association (AMA) Physician’s Recognition Award (PRA) guidelines.

II. **DEFINITIONS/ABBREVIATIONS**

A. **Continuing Medical Education (CME)** consists of educational activities which serve to maintain, develop, or increase the knowledge, skills, and professional performance and relationships that a physician uses to provide services for patients, the public or the profession. The content of CME is the body of knowledge and skills generally recognized and accepted by the profession as within the basic medical sciences, the discipline of clinical medicine, and the provision of health care to the public.

B. **Course** – A live CME activity where the learner participates in person and which is planned on a one-by-one basis and designated for credit as a single activity. Examples: annual meeting, conference, seminar.

C. **Regularly Scheduled Series** – A course is identified as an RSS when it is planned to have 1) a series with multiple sessions that 2) occur on an ongoing bases (offered weekly, monthly, or quarterly) and 3) are primarily planned by and presented to Advocate medical staff. Examples: Grand Rounds, Tumor Boards, and M&M conferences.

D. **Enduring Material** – Printed, recorded, or computer-presented CME activity that may be used over time at various locations and which, in itself, constitutes a planned activity.

E. **Enduring Material Internet Activity** – An enduring material internet activity is available when the physician participant chooses to complete it. It is “enduring”, meaning that there is not just one time on one day to participate in it. Rather, the participant determines when he/she participates. Examples: online interactive educational module.
F. **Commercial Interest** – any entity producing, marketing, reselling, or distributing health care goods or services consumed by, or used on, patients.

G. **Commercial Support** – financial, or in-kind, contributions given by a commercial organization, which is used to pay all or part of the costs of a CME activity.

III. **PROCEDURE**

A. **Planning a CME Activity** – Each activity certified for CME credit must be in compliance with the ACCME Essential Areas, Elements, Criteria, policies, and Standards for Commercial Support and AMA PRA policies.
   1. Each CME activity should be sponsored by one or more Advocate department(s) and/or site(s). The CME course director should be either a member of the Advocate medical staff or an Advocate associate and is in charge of planning, implementing, and evaluating the CME activity. The course director is responsible for assuring that the educational activity is educationally sound, free of commercial influence, fiscally responsible and meets documentation requirements. Commercial interests have no role in the planning, implementation or evaluation of CME activities.
   2. The primary audience of CME is attending physicians. An educational activity designed for and attended primarily by residents or fellows is not applicable for **AMA PRA Category 1 Credit™**.
   3. The activity is designed to address identified learning needs of physicians derived from professional practice gaps in knowledge, competence or performance in practice. These gaps are substantiated by the target audience, expert opinion, scientific literature, national guidelines, Maintenance of Certification requirements and/or quality improvement data.
   4. An outcome evaluation is required to analyze changes in learners (competence, performance or patient outcomes) achieved as a result of the educational intervention.
   5. Activity planning is documented in the CME activity proposal.

B. **Content of CME Activity** – The content developed must be objective, balanced, based on valid and sound scientific studies, and free of commercial bias. All educational activities must comply with the following guidelines regarding the content of CME activities:
   1. All the recommendations involving clinical medicine in a CME activity must be based on evidence that is accepted within the profession of medicine as adequate justification for their indications and contraindications in the care of patients.
   2. All scientific research referred to, reported or used in CME in support or justification of a patient care recommendation must conform to the
generally accepted standards of experimental design, data collection and analysis.

3. CME activities will not promote 1) Recommendations, treatment or manners of practicing medicine that are not within the definition of CME, 2) known to have risks or dangers that outweigh the benefits, 3) know to be ineffective in the treatment of patients.

4. To assure that content meets the above requirements, the CME office may request to review a copy of the presentation/content outline prior to the CME meeting/activity.

C. Identification and Resolution of Personal Conflicts of Interest

1. Everyone who is in a position to control the content of an educational activity has to complete a CME Disclosure Form prior to beginning their role in the CME activity to disclose all relevant financial relationships with any commercial interest(s).

2. The CME activity director will identify and resolve all conflicts of interest prior to the educational activity being delivered to learners.

3. All the information (no relevant financial relationships or relevant financial relationships) will be disclosed to learners prior to the beginning of the educational activity.

4. Procedures documented in system policy 90.17.56 Identification and Resolution of Conflicts of Interest in Continuing Medical Education must be followed.

D. Management of Commercial Support

1. Advocate may receive commercial support to pay all or part of the cost of a CME activity. The course director must ensure that Advocate has the total control of the CME activity and the content of the CME activity is independent of the commercial interest.

2. Advocate’s Written Agreement for Commercial Support with the terms, conditions, and purposes of the commercial support must be signed by the commercial supporter and Advocate. A written agreement from the commercial supporter is acceptable when these elements are included:
   a) the commercial supporter name
   b) the amount of funds or in-kind services that will be given by the commercial supporter to support the CME activity and that Advocate is solely responsible for the planning, implementation and evaluation of the activity and disbursing the commercial support
   c) the education partners, if applicable
   d) signed by the commercial interest and Advocate staff prior to the activity taking place.

3. All commercial support must flow through Advocate or Advocate’s educational partner. Advocate must make all decisions regarding the disposition and disbursement of commercial support. Only Advocate
and/or its educational partner can make payments to people for their role(s) in the activity.
4. Educational materials that are part of a CME activity, such as slides, abstracts and handouts, cannot contain any advertising, trade name or a product-group message.
5. Social events or meals at CME activities cannot compete with or take precedence over the educational events.
6. The source of all support from commercial interests must be disclosed to learners. When commercial support is in-kind, the nature of the support must be disclosed to learners prior to the beginning of the educational activity.

E. Management of Commercial Promotion
1. Live face-to-face meetings may include commercial exhibits. These exhibits cannot be a condition of the provision of commercial support for CME activities. The commercial interest should buy exhibit space with resources designated for that purpose. Payment and arrangements for exhibits are separate, business transactions for the sale of promotional space.
2. Advocate’s CME Written Agreement for Exhibits is required to be completed by the commercial interest to purchase the exhibit space.
3. Promotional activities must be kept separate from CME. Normally these are assigned to the “exhibit hall,” and they are clearly identified as such to the learner.
4. Product-promotion material or product-specific advertisement of any type is prohibited in or during CME activities.

F. Observation – The Advocate CME office staff, CME committee members and/or independent reviewer will monitor the CME activities to ensure they are in compliance with ACCME policies and AMA guidelines and free of commercial bias. If there is a cost associated with monitoring, the CME course director/sponsoring department will be responsible for the cost.

G. Documentation Requirement – The CME course director needs to complete the CME activity proposal and submit to site CME coordinator /CME committee if applicable. CME proposals will then be submitted to the CME office for approval. To ensure the CME activity meets ACCME and AMA policies, the CME activity proposal needs to be submitted within the deadline on the proposal form. Failure to submit all required documents will cause future CME applications submitted by that course director to be declined.
1. The following documents need to be submitted with CME proposals for approval:
   a) Practice gap/needs assessment data
   b) Signed disclosures from the course director, planner(s) and faculty
   c) A draft of the promotional material (The CME office needs to approve any promotional material prior to publication or distribution.)
   d) Letter of agreement for commercial support for each supporter, if applicable
   e) Copy of the grant request letter/form, if applicable
   f) Agenda, if longer than one hour
   g) For non-Advocate speakers
      (1) Invitation letter
      (2) Bio-sketch or CV
   h) Presentation slides/content outline if requested
   i) Outcome evaluation tool to measure changes in learner’s competence, performance or patients outcomes

2. The following documents need to be submitted within the deadline after the activity to complete the files:
   a) Participant attendance record
   b) Verbal disclosure form for live activities
   c) Final budget
   d) Copy of check from commercial supporter(s), if applicable
   e) Copy of check request for honorarium, if applicable
   f) Outcome evaluation results
   g) Handouts, if applicable
   h) Promotional material/flyer

H. Advocate sponsors the following types of CME activities and each has some special requirements:

1. Course
   a) The course is approved on a case by case basis. CME proposal and related documents must be submitted as per the submission date on the proposal.
   b) Post- Activity Paperwork submitted within 30 days after each meeting
   c) After the activity meeting, participants will evaluate the activity including change of competence and receive CME credit online. Evaluation of performance or patient outcomes may be submitted 6 months after completion of the activity.

2. Regularly Scheduled Series
   a) The RSS is approved for a 12-month period. CME proposal must be submitted as per the submission date on the proposal.
b) Post- Activity Paperwork submitted within 2 weeks after each meeting
c) Biannually, or more often as applicable, participants will evaluate the activity using Evaluation Form provided by the CME office. Evaluation of performance or patient outcomes may be submitted annually, prior to the renewal of the RSS.

3. Enduring Material
   a) CME proposal and related documents must be submitted as per the submission date on the proposal.
   b) There are special communication requirements that must be transmitted to the learner prior to starting the enduring materials activity:
      (1) Principal faculty and their credentials
      (2) Medium or combination of media used
      (3) Method of physician participation in the learning process
      (4) Estimated time to complete the educational activity (same as number of designated credit hours)
      (5) Dates of original release and most recent review or update
      (6) Termination date (date after which enduring materials are no longer certified for credit)
   c) Advertising of any type is prohibited within the activities.
   d) The activity director must be able to document that it owns the copyright for, or has received permission for use of, or is otherwise permitted to use copyrighted materials within the CME activity.
   e) A post test of competence is required. After completing the enduring material, participants will take the test, evaluate the activity and receive CME credit online. Evaluation of performance or patient outcomes may be submitted annually.
   f) The enduring materials must be reviewed at least once every three years or more frequently if indicated by new scientific developments. The enduring materials cannot be recertified for credit more than twice, so the enduring materials cannot be certified for more than a maximum of 9 years.

4. Enduring Material Internet Activity
   a) CME proposal and related documents must be submitted as per the submission date on the proposal.
   b) There are special communication requirements that must be transmitted to the learner prior to starting the activity:
(1) Principal faculty and their credentials
(2) Medium or combination of media used
(3) Method of physician participation in the learning process
(4) Estimated time to complete the educational activity
(same as number of designated credit hours)
(5) Dates of original release and most recent review or update
(6) Termination date (date after which enduring materials are no longer certified for credit)
(7) Hardware/software requirements
(8) Provider contact information for learner to be able to contact
(9) Policy on Privacy and Confidentiality - link to Advocate Notice of Privacy Practices

c) Activity Location: All Enduring Materials Internet Activity must be placed on the Advocate website.
d) Links from the Advocate educational website to commercial interest websites (example: pharmaceutical and device manufacturers’ product websites) are prohibited.
e) Advertising of any type is prohibited within the activities.
f) The activity director must be able to document that it owns the copyright for, or has received permission for use of, or is otherwise permitted to use copyrighted materials within the CME activity.
g) A post test of competence is required. After completing the enduring material internet activity, participants will take the test, evaluate the activity, and receive CME credit online. Evaluation of performance or patient outcomes may be submitted annually.
h) The enduring materials must be reviewed at least once every three years or more frequently if indicated by new scientific developments. The enduring materials cannot be recertified for credit more than twice, so the enduring materials cannot be certified for more than a maximum of 9 years.

I. COMPLIANCE
   1. Oversight of the accreditation and audits of CME activities rests with AHC’s Medical Education Department. The VPMM and site CME Committee chair are responsible for oversight of adherence to policies during the implementation and conduct of the activities.

IV. CROSS REFERENCE
   A. Advocate System Policy: Medical Education Relationship with Industry
   B. Advocate System Policy: Continuing Medical Education Honorarium and Reimbursement of Out-of-Pocket Expenses
C. Advocate System Policy: Identification and Resolution of Conflicts of interest in CME

V. REFERENCES
   A. The Physician’s Recognition Award and credit system, AMA 2006 revision
   B. ACCME Essential Areas, Elements, and Criteria
   C. ACCME Standards for Commercial Support

VI. RELATED DOCUMENTS/RECORDS
   A. CME Activity Proposal
   B. CME Written Agreement for Commercial Support
   C. CME Disclosure of Relevant Financial Relationships and Attestations